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January 14, 2008

**VIA FACSIMILE**

The Honorable Henry Pitman  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl St., Room 750  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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Re: Yves Saint Laurent v. Costco Wholesale Corp., et al.  
No. 07 Civ. 3214 (LBS) (HP)

Dear Magistrate Judge Pitman:

We represent the Yves Saint Laurent plaintiffs in the above action. We write to respectfully request (i) an extension of the January 18, 2008 date for plaintiffs to serve and file their motion for a protective order based on the French Blocking Statute, French Penal Code Law No. 80-538, and (ii) an extension of the January 22, 2008 date for plaintiffs to search their United States computer servers for electronic documents containing the search terms set forth in Your Honor's January 8, 2008 Order and to produce any responsive non-privileged electronic documents to defendant Costco Wholesale Corporation ("Costco").

First, during last Monday's discovery hearing, Your Honor ordered plaintiffs to serve and file their motion for a protective order based on the French Blocking Statute by this Friday, January 18, 2008. We respectfully request that the due date for plaintiffs' motion be extended until Friday, January 25, 2008, to provide plaintiffs additional time to properly brief the issue in light of the time we have been devoting to comply with other aspects of Your Honor's January 7, 2008 Order. Plaintiffs, of course, would consent to a corresponding extension of Costco's time to reply to our motion, to February 8, 2008, and are also amenable to having the same adjusted schedule apply to Costco's motion for a protective order, currently also to be filed by January 18, 2008.

Second, as Your Honor will recall, plaintiffs have been ordered to conduct twenty-eight additional electronic term searches on their United States servers, and to produce the results of these searches to Costco no later than January 22, 2008, a date we thought would be feasible during the January 7, 2008 discovery hearing. Unfortunately, we have since been informed by our clients' information technology department that the additional electronic searches are a monumental task which will require a great deal more time than originally anticipated, and will require the hiring of additional temporary personnel to conduct the searches. Further, given the configuration of our clients' IT system, which extends not only to YSL Beauté, Inc., the United States Yves Saint Laurent affiliate, but also covers other United States affiliates of Gucci Group NV, including Gucci America, Inc., we are informed that these searches will take four weeks

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to complete. Given the scope of the search, which is likely to yield thousands of documents, we anticipate needing an additional week to review the search results for privilege and responsiveness prior to production. Accordingly, we respectfully request that Your Honor extend the current January 22, 2008 date for production of the results of plaintiffs' additional electronic term searches of its United States servers through and including February 15, 2008.

We thank the Court for its consideration of this request.

Respectfully,

ARNOLD & PORTER LLP

By: Louis S. Ederer  
Louis S. Ederer

cc: Anthony J. Viola, Esq. (via facsimile)  
James W. Dabney, Esq. (via facsimile)  
Jeffrey Heller, Esq. (via facsimile)

PLAINTIFFS' TIME TO SUBMIT THEIR MOTION  
CONCERNING THE FRENCH BLOCKING STATUTE &  
COSTCO'S TIME TO SUBMIT ITS MOTION CONCERNING  
PLAINTIFFS' DOCUMENT REQUEST 20 IS EXTENDED TO  
1-25-08. PLAINTIFFS' TIME TO COMPLETE  
THE SUPPLEMENTAL SEARCH OF THEIR SERVERS  
& PRODUCE ADDITIONAL DOCUMENTS IS EXTENDED  
TO 2-15-08

**SO ORDERED**

Henry Pitman  
HENRY PITMAN  
UNITED STATES MAGISTRATE JUDGE  
1-16-08